RULEMAKING ISSUE
(Notation Vote)

March 27, 2015 SECY-15-0044

FOR: The Commissioners

FROM: Maureen E. Wylie
Chief Financial Officer

SUBJECT: PROPOSED VARIABLE ANNUAL FEE STRUCTURE FOR SMALL MODULAR REACTORS

PURPOSE:

To request Commission approval to draft a proposed rule that would amend Part 171 of Title 10 of the *Code of Federal Regulations* (10 CFR), "Annual Fees for Reactor Licenses and Fuel Cycle Licenses and Materials Licenses, Including Holders of Certificates of Compliance, Registrations, and Quality Assurance Program Approvals and Government Agencies Licensed by the NRC," and other affected parts, to include a variable annual fee structure for Small Modular Reactors (SMRs).

BACKGROUND:

The U.S. Nuclear Regulatory Commission's (NRC's) fee structure is based on the Omnibus Budget Reconciliation Act of 1990, as amended (OBRA-90), which requires the NRC to recover approximately 90 percent of its budget authority each year, less amounts appropriated from the Nuclear Waste Fund, amounts appropriated for waste incidental to reprocessing, and amounts appropriated for generic homeland security activities. To meet the requirements of OBRA-90, the NRC publishes a rule each year that establishes two types of fees:

(1) hourly fees and flat fees to recover NRC costs for specific services provided to identifiable applicants and licensees under 10 CFR Part 170, "Fees for Facilities, Materials, Import and Export Licenses, and Other Regulatory Services under the Atomic Energy Act of 1954, as Amended;" and

(2) annual fees under 10 CFR Part 171 to recover generic and other regulatory costs not otherwise recovered under 10 CFR Part 170.

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Under the current annual fee structure using a re-baselining method (see SECY-05-0164, "Annual Fee Calculation Method," dated September 15, 2005 (Accession No. ML052580332 in the NRC's Agencywide Documents Access and Management System (ADAMS)), the NRC allocates 10 CFR Part 171 annual fees equally among the operating power reactor licensees to recover budgetary resources expended for rulemaking and other generic activities which benefit the entire fee class. In 2008, NRC staff determined that the annual fee structure for 10 CFR Part 171 fees established in 1995 should be reevaluated to address potential inequities for future SMRs, due to the limited SMR power production capacity and SMR modularity.

For comparison, current operating power reactors have licensed power limits that range from 1,500 to 4,408 megawatts thermal (MWt). SMRs are expected to be much smaller in size than the reactors in the existing fleet, with licensed thermal power limits that will likely range from 160 to 800 MWt per module. Yet under the NRC's current fee structure, SMRs would be required to pay the same annual fee as the existing operating fleet, notwithstanding their smaller size.

In addition, under the 1995 fee structure, multi-module nuclear plants would be allocated 10 CFR Part 171 annual fees on a per-licensed-module basis. For example, a multi-module nuclear plant with 12 licensed SMR modules would have to pay 12 times the annual fee paid by a single large operating plant with an equivalent cumulative thermal power rating. Such a structure would be inconsistent with OBRA-90's mandate to allocate fees fairly and equitably.

In early 2009, NRC staff examined potential changes to the fee methodology and sought public input on the establishment of a variable annual fee structure for power reactors based on licensed thermal power limits. The NRC published an Advance Notice of Proposed Rulemaking (ANPR) for the variable annual fee structure for power reactors in the *Federal Register* on March 25, 2009 (74 FR 12735). While the ANPR nominally addressed the fee methodology used for all power reactors, its principal focus was on how to best adapt the existing fee methodology for future SMRs.

The NRC received a total of 16 public comments from licensees, industry groups, and private individuals, providing a wide range of inputs for agency consideration. Nine commenters supported adjusting the current power reactor annual fee methodology for small and medium-sized power reactors by some means. These commenters suggested basing the annual fee on either: a) a risk matrix, b) the thermal power ratings (in MWt), c) the cost of providing regulatory service, or d) an amount proportional to the size of the system based on megawatt (MW) ratings compared to a fixed baseline. Three commenters representing small reactor design vendors supported a variable fee rate structure as a means to mitigate the impacts of the existing fee structure on potential customers of their small reactor designs.

Other commenters that did not support the variable annual fee structure recommended the following changes to the fee methodology: a) reinstatement of reactor size as a factor in evaluating fee exemption requests under 10 CFR 171.11(c), b) establishment of power reactor subclasses, or c) performance of additional analysis before making any changes to the current fee structure. Two commenters expressed an unwillingness to provide a fee benefit to operating SMRs at the expense of their own businesses and believed that the flat-rate methodology provided regulatory certainty and assisted the ability to make ongoing financial plans.

In September 2009, the NRC staff submitted SECY-09-0137, "Next Steps for Advance Notice of Proposed Rulemaking on Variable Annual Fee Structure for Power Reactors," to the Commission for a notation vote (ADAMS Accession No. ML092660166). The paper summarized the comments received in response to the ANPR and requested Commission approval to form a working group to evaluate the computation of annual fees for power reactors by various fee methodologies. The Commission approved the staff's recommendation in the October 13, 2009, Staff Requirements Memorandum (SRM) to SECY-09-0137 (ADAMS Accession No. ML092861070).

The NRC staff subsequently formed a working group composed of representatives from the Office of the Chief Financial Officer (OCFO), the Office of the General Counsel (OGC), and the Office of New Reactors (NRO) to analyze the various fee methodologies that were identified in the public responses to the ANPR. The working group analyzed the ANPR comments, as well as position papers from the Nuclear Energy Institute (NEI), "NRC Annual Fee Assessment for Small Reactors," dated October 2010 (ADAMS Accession No. ML103070148); and from the American Nuclear Society (ANS), "Interim Report of the American Nuclear Society President's Special Committee on Small and Medium Sized Reactor (SMR) Generic Licensing Issues," dated July 2010 (ADAMS Accession No. ML110040946).

Four possible alternatives emerged from the comments and the working group's analysis that, in the staff's opinion, would be equitable to all power reactor licensees, including SMRs:

1. Continue the existing annual fee structure, but define a modular site of up to 12 reactors or 4,000 MWt licensed power as a single unit for annual fee purposes.
2. Create fee classes for groups of reactor licensees and distribute the annual fee costs attributed to each fee class equally among the licensees in that class.
3. Calculate the annual fee for each licensed power reactor as a function of potential risk to public health and safety using a risk matrix.
4. Calculate the annual fee for each licensed power reactor as a function of its licensed thermal power rating (MWt).

The working group examined these four alternatives and informed the NRC's Chief Financial Officer (CFO) that Alternative 4 was the preferred recommendation. Alternative 4 allows SMRs to be assessed specific fee amounts based on their licensed thermal power ratings (measured in MWt) on a variable scale with a minimum fee and maximum fee. This variable scale also allows for the single site treatment of multi-module nuclear plants for licensed reactor modules up to 4,000 MWt.

However, the working group did not recommend that the variable fee methodology should be applied to existing operating reactors. The working group determined, based on public feedback in response to the ANPR, on feedback from public meetings held in 2010, and from the position papers from NEI and ANS referenced above, that the NRC's uniform fee policy for the operating reactor fleet should remain unchanged. For example, Exelon's response to the ANPR stated that the current uniform base fee for all power reactors provides predictability, stability, and fairness of allocating NRC's cost recovery. This statement further supported the NRC's fiscal year (FY) 1995 policy to streamline the fee program by assessing one uniform fee. For the NRC, the previous methodology for calculating operating reactor annual fees was labor intensive and time consuming. At that time, the NRC further determined that the detailed breakdown of the reactor

fee calculations used to compute the significant differences in research funding for the various types of reactors no longer existed. Therefore, the uniform base fee for all power reactors in FY 1995 proved to be the optimal approach because it simplified the fee process without causing undue burden to industry and the NRC.

The working group also recommended to the CFO that the use of a licensed thermal power rating as a benchmark is the best approach for calculating 10 CFR Part 171 fees because this method best satisfies the "fairly and equitably" requirements of OBRA-90. Conceptual SMR proposals reviewed by the NRC to date comprise a variety of designs and intended purposes, including electrical power generation, industrial process heat, and desalination. Additionally, ANPR respondents noted that different SMR designs used for electrical power production could have varied levels of power conversion efficiency. Basing fees on power production, therefore, could have the unintended effect of increasing fees for a licensee with greater efficiency compared to a similar SMR with an equivalent thermal power rating but lower electrical power conversion efficiency. The working group recommended that licensed thermal power be used as the fee benchmark because it offers the most appropriate means of ensuring that fees across the SMR class were fair and equitable.

In comparison to the recommended Alternative 4 approach, the working group determined that Alternative 1 showed some fee relief for multi-module sites by allowing the power ratings of multiple modules to be combined, similar to the treatment of certain size multiple units under the Price-Anderson Act.[1] However, for a single module site, the high annual fee still could substantially exceed the cost of providing regulatory services to these licensees, posing the same OBRA-90 fairness problem. For Alternative 2, the working group found that the generic costs recovered through annual fees do not always align with a particular class of licensees, nor can annual fees be appropriately distributed among licensees. The NRC determined in 1995, when it previously allocated annual fees to different licensee classes, that this approach can result in complex and inefficient analyses that do not provide a clear or reliable determination of licensee annual fees. Finally, Alternative 3 would require the staff to establish a risk matrix for all operating power reactor licensees (including SMRs) that considers factors such as source term, baseline core damage frequency, and early large release frequency as components of the matrix to determine the probability of risk to public health and safety in computation of the annual fee. The working group determined that this fee methodology would be costly to implement and maintain as probabilistic risk analysis technology evolves. Further, and perhaps more critically, Alternative 3 is arguably contrary to OBRA-90, which requires the NRC to allocate fees based on regulatory costs rather than regulatory risk factors, and could be legally objectionable.

The CFO transmitted the working group's final recommendations to the Commission in an informational memorandum dated February 7, 2011, "Resolution of Issue Regarding Variable Annual Fee Structure for Small and Medium-Sized Nuclear Power Reactors" (ADAMS Accession No. ML110380251). The memorandum described the results of the working group's efforts and

[1] *See* 42 U.S.C. § 2210(b)(5)(B) (stating that multi-reactor facilities at a single site consisting of reactors with a rated capacity between 100,000 electrical kilowatts and 300,000 electrical kilowatts are treated as a single entity for insurance purposes if those reactors have a combined rated capacity less than 1,300,000 electrical kilowatts).

its recommendation that the annual fee structure for SMRs should be calculated for each newly licensed power reactor as a function of its licensed thermal power rating. The memorandum indicated that the staff intended to obtain Commission approval for the planned approach prior to the initiation of the SMR proposed rulemaking. Following submission of this memorandum, the working group had completed its charter and was disbanded.

This paper discusses the staff's activities since issuance of the 2011 memorandum, the staff's revised final recommendations, and the rationale for establishing a variable annual fee structure for SMRs.

DISCUSSION:

In July 2014, in preparation for this proposed SMR rulemaking, the OCFO reconstituted the SMR Fees working group, composed of members from OCFO, NRO, the Office of Nuclear Reactor Regulation, the Office of Nuclear Material Safety and Safeguards, the Office of Administration, and OGC. The working group reviewed the analysis and recommendations in the 2011 memorandum and determined that they remained sound. The working group also identified one additional area for consideration related to the maximum thermal power rating eligible for a single annual fee.

In the 2011 memorandum, the CFO proposed an upper threshold of 4,000 MWt for multi-module power plants to be allocated a single annual fee. This value was comparable to the largest operating reactor units at the time (Palo Verde Nuclear Generating Station Units 1, 2, and 3 at 3,990 MWt each). Since 2011, an approved power uprate for Grand Gulf Nuclear Station, Unit 1 has raised the maximum licensed thermal power rating to 4,408 MWt. Therefore, the current working group recommends setting the single-fee threshold for a multi-module nuclear plant at 4,500 MWt on the SMR variable annual fee structure scale.

With this change, the CFO continues to recommend Alternative 4 as the best approach to provide regulatory certainty for SMR fees and satisfaction of OBRA-90 requirements. This alternative includes a variable annual fee structure for SMRs to be calculated as a function of the cumulative licensed thermal power rating and single-fee treatment of reactor modules with a cumulative licensed thermal power rating of up to 4,500 MWt.

Section 6101 of OBRA-90 states, in pertinent part:

> (3) AMOUNT PER LICENSEE - The Commission shall establish, by rule, a schedule of charges fairly and equitably allocating the aggregate amount of charges described in paragraph (2) among licensees. To the maximum extent practicable, the charges shall have a reasonable relationship to the cost of providing regulatory services and may be based on the allocation of the Commission's resources among licensees or classes of licensees.

Regarding the relationship between the 10 CFR Part 171 annual fee charges for SMRs and the cost of providing regulatory services to SMRs, the NRC staff currently lacks quantitative data to suggest that SMRs will require fewer (or more) NRC resources in comparison to current operating power reactors because there are not yet any operating SMRs regulated by the NRC. But, SMRs are expected to be significantly smaller than large power reactors, and will likely

incorporate innovative concepts such as factory fabrication, advanced passive safety features, security-by-design features, and Nuclear Steam Supply System/Balance of Plant modularity. SMRs are expected to have enhanced levels of safety and therefore may require a reduced emergency planning (EP) zone size, reduced plant staffing, and potentially reduced NRC oversight requirements.[2] These features may reduce the NRC's generic resource support requirements for SMRs as a class. Therefore, even though the staff cannot develop a quantitative basis at this time, a qualitative assessment of SMR support resource requirements based on these considerations provides an initial means of satisfying OBRA-90 because it provides a reasonable basis for the premise that the generic regulatory costs associated with regulating SMRs may be smaller than those regulatory costs associated with the existing fleet of power reactors. This premise would justify applying a lower and variable annual fee for SMRs, because most SMRs may not require the same amount of NRC staff regulatory services as their larger counterparts. Further, if experience does not validate the staff's assumptions once SMR support resource data becomes available, then the NRC can review and potentially modify the SMR variable annual fee structure through rulemaking to ensure that the NRC is allocating its fees in a fair and equitable manner. This is an advantage of the variable annual fee approach-it will provide the NRC with the flexibility to ensure that the agency remains compliant with OBRA–90 as SMR operational cost data is acquired. The staff will commit to review data for SMR support requirements annually, once SMRs become operational, and to make adjustments as needed in the annual fee rulemakings to ensure that the requirements of OBRA-90 are fully met. If the proposed SMR policy is approved by the Commission, the NRC staff plans to commence development of a proposed rule to implement Alternative 4 using the following definitions and criteria for the SMR variable annual fee structure:

-***Small Modular Reactor*** for the purpose of calculating fees, means the class of power reactors having a licensed thermal power rating less than or equal to 1,000 MWt (300 MWe) per module.

-***Multi-module Nuclear Plant*** means a nuclear power station that consists of two or more essentially identical nuclear reactors (SMRs), where each module is a separate nuclear reactor capable of being operated independent of the state of completion or operating condition of any other module co-located on the same site, even though the nuclear power station may have some shared or common systems. The licensed thermal power rating for a multi-module nuclear plant is the cumulative licensed thermal power rating of all modules licensed for operation. Multi-module Nuclear Plants are eligible for the SMR variable annual fee structure.

The NRC staff would use the following equation in the SMR variable annual fee structure to calculate 10 CFR Part 171 fees for SMR licensees:

Annual Fee = Minimum Fee + [Power-250] (MWt) X Fee Rate ($/MWt)
(Not less than the Minimum Fee)
(Not to exceed the Maximum Fee)

In the above equation:

Minimum fee is defined as the low threshold on the variable scale for an SMR or multi-module nuclear plant with a total licensed thermal power rating for all modules less than or equal to

[2] http://www.energy.gov/ne/nuclear-reactor-technologies/small-modular-nuclear-reactors

250 MWt. The *minimum fee* is the average of the individual fees for the research and test reactor fee class and the spent fuel storage/reactor decommissioning fee class.

Power refers to the cumulative licensed thermal power rating of an SMR or multi-module nuclear plant.

Fee rate is the slope of the variable scale based on the difference between the *maximum fee* and *minimum fee* divided by the difference between the upper limit of cumulative licensed thermal power for the variable fee (2,000 MWt) and the lower limit of cumulative licensed thermal power for the variable fee (250 MWt).

Maximum fee is defined as the fee assessed to all large power reactors with thermal power ratings of greater than 2,000 MWt licensed prior to the revised rule effective date and to all reactors with thermal power ratings of greater than 2,000 MWt licensed after the effective date of the final rule on the variable annual fee structure for SMRs. The thermal power rating for multi-module nuclear plants is based on the cumulative licensed thermal power rating of all modules. Multi-module nuclear plants will pay additional annual fees, if the cumulative licensed thermal power exceeds 4,500 MWt, similar to the current treatment of multi-unit power reactor sites.

An SMR or multi-module nuclear plant would pay a minimum annual fee if its power is less than or equal to 250 MWt, plus an additional variable fee if the cumulative licensed thermal power is above 250 MWt, up to a maximum of 2,000 MWt. For any licensed power rating above 2,000 MWt, the maximum annual fee applies.

For example, applying the FY 2014 annual fee data for a hypothetical SMR with a cumulative licensed thermal power rating of 500 MWt would result in the following SMR annual fee (all values rounded):

Annual Fee = Minimum Fee + [Power-250] (MWt) x Fee Rate ($/MWt)
Annual Fee ($878,250) =$154,250 + (250 x $2,896)

For purposes of comparison, the total FY 2014 annual fee per operating power reactor was $5.223 million dollars (see the 2014 Final Fee Rule published in the *Federal Register* on June 30, 2014 (79 FR 37124)).

Impact of Proposed 2015 SMR Policy on Fee Collections

The NRC does not assess power reactor licensees 10 CFR Part 171 annual fees until the reactor is either given an operating license (under 10 CFR Part 50) or has received a Commission finding that combined license acceptance criteria have been met under 10 CFR 52.103(g). Initially, all fees assessed to SMRs would be generated under 10 CFR Part 170 (direct hourly fees) because the fees would be based on specific services performed by the NRC for the benefit of a specific SMR applicant prior to issuance of an operating license. In a given FY, the NRC staff predicts that collections will increase under 10 CFR Part 170 from pre-operational SMRs which could result in a smaller required total fee recovery amount under 10 CFR Part 171 for the total operating power reactor fee class.

The NRC does not expect to license an SMR facility for operation for several years because an application has not yet been received. However, the NRC is proposing this rule now, well before operation, to promote regulatory consistency and transparency, as well as to provide potential SMR applicants, the industry and the public with notice and the opportunity to comment on the methodology which will be used to calculate 10 CFR Part 171 annual fees for licensed SMR facilities. In its 2010 position paper referenced above, NEI emphasized, "Recognizing that a large annual fee presents a serious challenge to reactor designers, investors, and potential customers who are currently making investment decisions, we highly recommend that the NRC not postpone this rulemaking until after a small reactor license application is submitted."

In the absence of an approved SMR policy by the Commission, SMRs would be subject to the current annual fee structure for operating power reactors, which is a uniform fee for all reactors. However, with or without an established SMR policy from the Commission, SMR licensees would have the option of applying for fee exemptions under 10 CFR 171.11(c) annually. The fee exemption criteria for reactors under 10 CFR 171.11(c) consider the following factors: (1) age of the reactor; (2) number of customers in rate base; (3) net increase in kilowatt-hour cost for each customer directly related to the annual fee assessed under this part; and (4) any other relevant matter which the licensee believes justifies the reduction of the annual fee. SMRs, whether licensed as stand-alone units or grouped as a multi-module power plant, are likely to have significantly less power generation capacity than the majority of the current operating power reactors. Therefore, these assumptions regarding SMRs could be considered under factors 2, 3, and 4 of 10 CFR 171.11(c) in determining whether a fee exemption should be approved or denied.

The NRC has granted partial exemptions from the annual fee for certain small power reactors where imposition of the full annual fee would constitute a disproportionate burden for the affected plants. *See* Memorandum from John C. Hoyle, Acting Secretary, to Victor Stello, Jr., EDO, "SECY-87-66-Partial Exemptions from 10 CFR Part 171, Annual Fee for Power Reactor Operating Licenses," dated April 3, 1987 (ADAMS Accession No. ML022830198).[3] *See* SECY-87-66, "Partial Exemptions from 10 CFR Part 171, Annual Fee for Power Reactor Operating Licenses," dated March 11, 1987 (ADAMS Accession No. ML022830195).[4] An SMR licensee applying for a fee exemption would not be guaranteed approval of its request. Reliance on individual exemptions from annual fee requirements contributes significantly to a lack of regulatory certainty for potential SMR developers and prospective applicants, especially when formulating an initial business case for the facility many years in advance of operation. In particular, a developer or prospective applicant will not know whether it would successfully obtain an exemption in the first instance, the extent of such an exemption, or whether an exemption would be granted in future years at all, and, if so, in at least the same amount.

Therefore, the CFO recommends that this variable fee policy for SMRs which considers factors similar to the agency's existing rationale for granting fee exemptions should be established now.

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[3] The SRM advised that the Commission did not object to an NRC staff proposal (provided for negative consent) to grant a partial exemption from the FY 1987 annual fee for the Yankee Rowe, Big Rock Point, and Vermont Yankee plants.

[4] Enclosure 4 to the paper provides detailed factors the staff considered in pricing the reductions for each of the units.

This best satisfies the requirements of OBRA-90 and the interests of transparency and regulatory certainty.

Impact of Proposed 2015 SMR Policy on Fee Regulations

The SMR variable fee rulemaking would result in some changes to the regulations under 10 CFR Part 171, including new and revised definitions of reactor fee classes and fee thresholds, to be described in the proposed SMR variable fee rule. Conforming changes would also be required for associated affected sections of 10 CFR Part 170, to ensure consistency with the changes to 10 CFR Part 171.

Consistent with its policy regarding multiple rule changes to the same CFR parts, the Office of the Federal Register will not publish this SMR proposed rulemaking until the FY 2015 final fee rule is effective in August 2015. Therefore, the NRC proposes to publish this rule in October 2015.

RECOMMENDATION:

The NRC staff requests approval to proceed with the SMR rulemaking, which would amend the current fee regulations under 10 CFR Part 171 and other affected parts to add variable annual fees for SMRs and multi-module nuclear power plants, and associated administrative changes. To implement the SMR variable fee structure, staff will publish a proposed rule for public comment. By implementing these recommended policy changes, the annual 10 CFR Part 171 fee allocation for all operating power reactors, including future SMRs, would be fairly and equitably allocated as required by OBRA-90. Both the proposed rule and final rule will be forwarded to the Commission for a 5-day review period (much like the annual fee rule), before they are sent to the Office of the Federal Register for publication. Implementation of the proposed changes to the NRC annual fee structure via rulemaking would address inequities of the current 10 CFR Part 171 fee structure relative to future SMRs and multi-module nuclear plants. Multi-module nuclear plant fees would be based on the cumulative thermal power of all licensed SMR modules at each station.

For SMRs and multi-module nuclear plants licensed after the publication of the SMR final rule, the annual fees would be determined by the SMR variable annual fee scale. Upon the effective date of the final rule, multi-module nuclear plants with a cumulative licensed thermal power for all licensed modules greater than 4,500 MWt, would be treated as a second unit for the purposes of fee allocation and would be assessed additional annual fees.

The staff continues to support its policy of a uniform fee for the current operating power reactor fleet because the facts and circumstances that led to the formation of the policy remain unchanged.

RESOURCES:

This rulemaking has no significant impact on resources.

SCHEDULE:

After the Commission provides direction on this paper, OCFO staff will prepare a proposed rule. OCFO expects that it will take several months after issuance of the SRM to submit a proposed rule to the Commission for approval. At that time, OCFO will provide the Commission with a proposed schedule that includes the proposed, final, and effective dates of the SMR rulemaking. The completion of the SMR rulemaking will occur between the fall and winter months so it does not interfere with the annual fee rulemaking schedule dates. The SMR rulemaking process should begin in September 2015 and end in February 2016 in order for the SMR policy to become effective in FY 2016.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Executive Director for Operations has concurred on this paper.

/RA/

Maureen E. Wylie
Chief Financial Officer

cc: SECY
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